

I have been closely involved on a hobby basis with radio technology since 1977 and the Internet since 1994. In addition I am a licensed radio amateur holding the General class call sign of KA8SEP.

The HF radio spectrum is used by a very diverse selection of users both here in the US and overseas. Some users depend on reliable HF communication for safety and interference with HF communications could potentially put people's lives in jeopardy.

To enable new technologies to become established the FCC has implemented part 15, almost all existing part 15 devices radiate from a single location and in the event of a problem are easily identified. A case in point was the recent tracking of interference to air traffic control from a baby monitor. BPL will radiate from multiple locations and the interference will be similar to white noise; and difficult to locate if interference occurs. To enable the tracking of interference from BPL, a 5 wpm Morse ID could be added to the BPL bit stream so that the source of interference can be rapidly identified without needing complex decoding equipment.

Japan ran in depth tests and the result caused them to instantly ban this technology. The Finish government has also banned BPL due to the concerns about interference.

BPL (called PLC in the UK) was first introduced in Manchester U.K. in 1997 and the FCC may find it useful to review two reports prepared by the BBC in the UK that carefully examines the signal levels at which BPL systems can successfully operate with causing interference.

The two reports can found here;

<http://www.bbc.co.uk/rd/pubs/whp/whp-pdf-files/WHP012.pdf>

<http://www.bbc.co.uk/rd/pubs/whp/whp-pdf-files/WHP004.pdf>

Thank You